

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

SAMUEL RUSSELL WOOD,

*Plaintiff,*

v.

LARRY R. ARNOLD,

*Defendant.*

**ARNOLD'S OBJECTIONS TO PLAINTIFF'S  
DEPOSITION DESIGNATION AND COUNTER-  
DESIGNATIONS OF DEPOSITION TESTIMONY**

*Case No. 6:18-cv-53*

The Defendant, Larry R. Arnold, files these objections to the Plaintiff's deposition designation and submits the following counter-designations pursuant to *Fed.R.Civ.P.* 32(a)(6):

**Dr. Joyce Huerta (3/4/2019)**

Of the portion of Dr. Huerta's deposition that was formally designated by the plaintiff on April 9, 2019:

Arnold objects to pages 25:19-25:22 on the ground that medical opinion testimony regarding a possibility is irrelevant, purely speculative, and unfairly prejudicial (*Fairfax Hospital System v. Curtis*, 249 Va. 531, 535, 457 S.E.2d 66, 69 (1995); F.R.E. 401, 403).

If Dr. Huerta's testimony is admissible by deposition, Arnold counter-designates the following additional portions of Dr. Huerta's deposition:

39:19-41:7; 41:11-41:17; 41:19-42:8; 42:10-43:11; 43:13; 43:14-44:3; 44:5-45::18; 47:5-47:15; 48:4-48:8.

Respectfully submitted,

LARRY R. ARNOLD

By \_\_\_\_\_ /s/  
Of Counsel

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true copy of the foregoing pleading was electronically filed on April 9, 2019 with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

\_\_\_\_\_ /s/ \_\_\_\_\_